

Exhibit C

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

BRUCE MACDONALD, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

DYNAMIC LEDGER SOLUTIONS, INC.,
a Delaware corporation, TEZOS
STIFTUNG, a Swiss Foundation,
KATHLEEN BREITMAN, an
Individual, ARTHUR BREITMAN,
an Individual, TIMOTHY COOK
DRAPER, an individual, DRAPER
ASSOCIATES, JOHANN GEVERS,
DIEGO PONZ, GUIDO SCHMITZ-
KRUMMACHER, BITCOIN SUISSE AG,
NIKLAS NIKOLAJSSEN and DOES 1-100,
INCLUSIVE,

Defendants.

Case No. 3:17-cv-07095-RS

CLASS ACTION

**PLAINTIFFS' NOTICE OF DEPOSITION
OF DEFENDANT TEZOS
STIFTUNG PURSUANT TO FEDERAL
RULE OF CIVIL PROCEDURE 30(b)(6)**

PLEASE TAKE NOTICE that, pursuant to Rules 30 and 45 of the Federal Rules of Civil Procedure, Plaintiffs in the above-captioned action, by its counsel, will take the oral deposition of Defendant Tezos Stiftung regarding the subject matters set forth in the attached Schedule B, which shall be interpreted in accordance with the definitions and instructions set forth in Schedule A.

The deposition shall commence at 10:00 a.m. on March 7, 2018 at the Berkeley offices of Hagens Berman Sobol Shapiro LLP, or at such other time and location as agreed upon by counsel, and continuing thereafter until completed. The deposition will be recorded by stenographic means.

By March 2, 2018, Defendant Tezos Stiftung shall provide a written designation of the name(s) and position(s) of the one or more officers, directors, or managing agents, or other persons who will be produced to testify on Tezos Stiftung's behalf concerning the matters set forth in Schedule B. Pursuant to Federal Rule of Civil Procedure 30(b)(6), the person(s) designated by Tezos Stiftung should be prepared to testify to such matters known or reasonably available to Tezos Stiftung. The person testifying shall bring to the deposition, or produce beforehand, all documents reviewed, relied upon or considered in preparation of the deposition.

DATED: January 10, 2018

Respectfully submitted,

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Reed R. Kathrein

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SCHEDULE A

DEFINITIONS AND INSTRUCTIONS

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3 1. “Defendants” “you” or “your” refers to Dynamic Ledger Solutions, Inc., Tezos
4 Stiftung, Kathleen Breitman, Arthur Breitman, Timothy Cook Draper, Draper Associates, Johann
5 Gevers, Diego Ponz, Guido Schmitz-Krummacher, Bitcoin Suisse AG, and Niklas Nikolajsen. All
6 references to the “Breitmans” (plural) refer to both Defendant Kathleen Breitman and Defendant
7 Arthur Breitman.

8 2. “Communication” or “communications” refers to every manner or means of disclosure,
9 transfer or exchange of information (in the form of facts, ideas, inquiries or otherwise), whether orally,
10 electronically, by document, telecopier, mail, personal delivery or otherwise.

11 3. The “Complaint” refers to Plaintiffs’ Class Action Complaint for Violations of
12 California Corporations Code § 25110 and California’s Unfair Competition Laws (Dkt. No. 1) in the
13 above-captioned case. All paragraph references herein are to the Complaint.

14 4. “DLS,” or “Dynamic Ledger Solutions” refers to defendant Dynamic Ledger Solutions,
15 Inc. and its parents, subsidiaries, predecessors, successors, divisions, affiliates, operating units,
16 controlling persons, controlled persons, officers, directors, employees, representatives or agents.

17 5. “ICO Proceeds” refers to all funds collected via or derived from the Tezos Initial Coin
18 Offering (the “ICO” or “Tezos ICO”).

19 6. “Putative Class,” “Member of Putative Class,” or “Putative Class Member,” as
20 defined in ¶1 of the Complaint, refers to:

21 [A]ll persons who purchased Tezos tokens (aka “XTZ”, “Tezzies” or “tez”) by
22 contributing fiat currency (e.g., U.S. Dollars) or other consideration (including the
23 blockchain-based digital currencies bitcoin (BTC) and/or Ethereum (“ETC” or
“ether”)) to the Tezos “Initial Coin Offering” (“ICO”) in July 2017.

24 7. “Tezos Stiftung”, “Tezos Foundation”, or the “Foundation” refers to Defendant Tezos
25 Stiftung and its parents, subsidiaries, predecessors, successors, divisions, affiliates, operating units,
26 controlling persons, controlled persons, officers, directors, employees, representatives or agents.

8. These requests are being made on an expedited basis, and Plaintiff reserves all rights to supplement these requests in the ordinary course.

SCHEDULE B

TOPICS FOR DEPOSITION

1. ICO Proceeds (including how and in what form those proceeds were obtained, where those proceeds exist, how and for what purpose they have been transferred since they were obtained, the process by which they may be transferred or exchanged, the processes and procedures for safekeeping those proceeds, and recordkeeping related to those proceeds).

2. Regulatory intervention or oversight by Swiss authorities over Tezos Stiftung.

3. Any documents relating to the results of any audits of Tezos Stiftung.

4. The resignation of Defendant Schmitz-Krummacher and his replacement and/or efforts to select his replacement.

5. The termination of the Foundation's auditor.

6. The formation and governance of the Foundation.

7. The selection of the directors of the Foundation.

8. The basis of, the allegations by the Breitmans against Johann Gevers as alleged in ¶¶ 102-103 of the Complaint.

9. The 46-page letter referenced in ¶ 103 of the Complaint, as well as the allegations of self-dealing by Johann Gevers.

10. Johann Gevers' request for the Foundation to pay him a bonus.

11. The removal of, or attempts to remove, Johann Gevers from the Foundation board.

12. The suspension of Johann Gevers's operational role in the Foundation.

13. Any investigation or audits of the Foundation and the ICO Proceeds.

14. Gevers' allegations that the "Breitmans have been trying to control the foundation as if it were their own private entity by bypassing the foundation's legal structure and interfering with management and operations" and of the Breitmans "illegal coup" as alleged in ¶ 104 of the Complaint.

1 15. Communications between the Breitmans and/or DLS and the Foundation since the ICO.

2 16. Any agreements between DLS and the Foundation.

3 17. The Foundation's involvement in the promotion of the ICO, or the solicitation of ICO
4 proceeds, or the creation of websites to promote or facilitate the ICO.

5 18. Activities undertaken by the Foundation, its officers, or agents, in the United States.